

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

PIC Corporation,

Plaintiff,

v.

The Entities and Individuals Identified in  
Annex A,

Defendants.

Case No. 1:24-cv-1444

Judge Matthew F. Kennelly

**DECLARATION OF XIN CHEN IN SUPPORT OF DEFENDANT’S MOTIONS**

I, Xin Chen, declare as follow:

1. I am the Chief Executive Officer of Larryhot Trading Co., Ltd. (**Larryhot**), which operates the internet store, supvogue.com (the **Store**), identified in this lawsuit. In this capacity, I have personal knowledge of the Store’s operation and sales and have access to Larryhot’s business records.

2. I make this declaration based on my personal knowledge and after reviewing Larryhot’s business records. If called as a witness, I can competently testify to the matters stated herein. I make this declaration in support of Defendant’s Reply in Support of Motion to Dismiss.

3. The Store supvogue.com does not have a “ship-to” option on the homepage of its website. *See Exhibit D.*

4. The Store’s website, supvogue.com, utilizes the service of a website building provider which build up the Store’s website on a template, which does not contain a “ship-to”

option for a consumer to choose at the homepage or a product's webpage. The Defendant did not intentionally choose any particular design of the website to target the market of any state.

5. The Store conducts business globally, and regularly sells products to other parts of the world outside of the U.S. Defendant and the Store did not intentionally target the market of the United States as opposed to other international markets.

6. The Store did not have any communication with the customer who placed the only order for the alleged product in this matter, either before or after the placement of the order.

I declare under the penalty of perjury under the laws of the United States of America that the foregoing is true and accurate.

Executed on this 26th day of June, 2024, in Xiamen, Fujian Province, China.

Dated: June 26, 2024

By: Xin Chen  
Xin Chen

# EXHIBIT D



This is collections



♥♥ HOT SALE

HOME



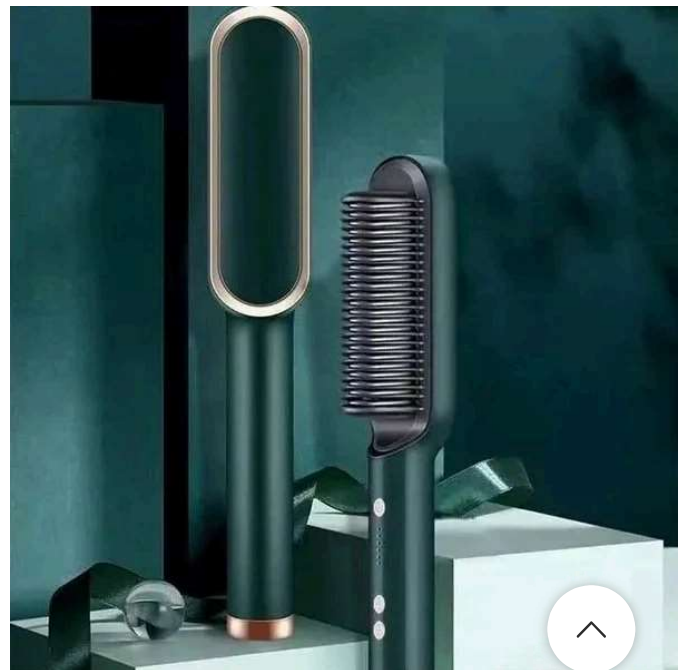


ALL PRODUCTS

THIS WEEK'S BEST SELLERS



🔥 LAST DAY 60% OFF 🔥 Cordless...  
\$29.98 ~~\$69.98~~



Last Day 50% OFF -New Hair Straightener...  
\$26.96 ~~\$47.99~~





Hollow Metal Dragon Shaped Carving Dice..

\$29.94 \$49.99



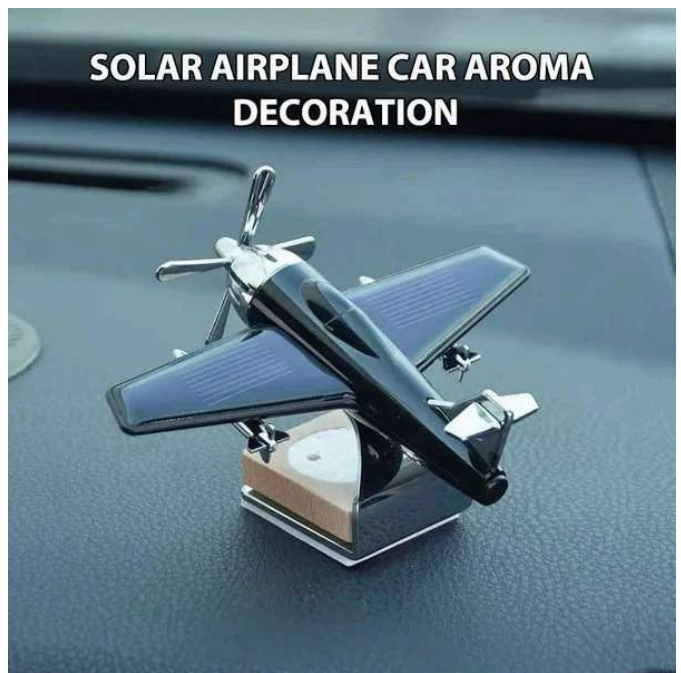
3 Way Kitchen Faucet 🔥 BUY 3 GET 1 FREE

\$19.96 \$41.99



2 in 1 Floor Brush(Brush + scrape) 🔥 BUY 3..

\$19.96 \$39.99



Solar Aircraft With Unique Fragrance

\$19.96 \$33.99





☰  USD  English

supvogue

🔍 👤 🛒<sup>1</sup>



LED Solar Lamp Path Staircase Outdoor...

**\$8.96** ~~\$12.99~~



KITCHEN CHOPPING ARTIFACT 🔥 BUY 2...

**\$29.96** ~~\$49.99~~



Retractable Double Layer Car Wash Brush...

**\$27.96** ~~\$52.99~~



Jewelry Cleaner Spray 🔥 BUY 2 GET 1 FREE

**\$14.96** ~~\$39.99~~

^



☰  USD  English

supvogue

🔍 👤 🛒<sup>1</sup>



LED Color Changing Solar Wind Chime Lig...

~~\$49.99~~  
**\$26.96**



Wave Pattern Stackable Hanger 🔥 BUY 3...

~~\$19.99~~  
**\$9.96**





*supvogue*



**+ 20000 HAPPY CUSTOMERS**



No matter where you are, who you are and what you are  
passionate about we want to be able to provide you with



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### About supvogue



### OUR PAYING METHOD



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